

**From:** [Phillip Winsor](#)  
**To:** [Arredondo, Alonzo](#)  
**Cc:** [Gary Moore/R6/USEPA/US@EPA](#)  
**Subject:** RE: Tank 26 Water Analysis  
**Date:** 04/10/2012 08:21 AM

---

Alonzo;

I concur that the sample would be a characteristically hazardous for benzene (D018). Also checking with the Industrial Wastewater Section, there are no conditions that deal with 'hazardous' versus 'non-hazardous' wastes, but for making sure the water balance for the irrigated area must not be exceeded and allow wastewater to reach the 'waters of the state'. My question is what are the concentrations of the treated wastewater that will be applied? It's assumed that this sample hasn't been treated (carbon filtration, pH stabilization etc.). The treated wastewater must not be toxic to the grasses and shrubs in the proposed irrigated areas.

Are you going to treat the stored 'rainwater' that is characteristically hazardous for benzene before application?

---

**From:** Arredondo, Alonzo [mailto:[AArredondo@trcsolutions.com](mailto:AArredondo@trcsolutions.com)]  
**Sent:** Thursday, April 05, 2012 9:34 AM  
**To:** Phillip Winsor  
**Cc:** [Moore.Gary@epamail.epa.gov](mailto:Moore.Gary@epamail.epa.gov)  
**Subject:** FW: Tank 26 Water Analysis

Phil,  
Good Morning!

Gary Moore and I have been discussing the treatment standards that will apply (in addition to the report requirements that have been identified in Satya's memo in the TCEQ's Dec 20, 2011 Approval Letter) for the treated wastewaters from Tank 26 at the Falcon Refinery. Please find attached a copy of the universal treatment standards for wastewater and the results of analysis for water from Tanks 26, 10, 30 and 7.

If you are available, I will contact you later this morning to discuss TCEQ Superfund's reporting requirements and discharge limits.

Alonzo G. Arredondo  
Senior Geologist  
TRC Environmental Corp.

**From:** Gary Moore [mailto:[Moore.Gary@epamail.epa.gov](mailto:Moore.Gary@epamail.epa.gov)]  
**Sent:** Thursday, March 08, 2012 12:02 PM  
**To:** Arredondo, Alonzo  
**Subject:** Re: Tank 26 Water Analysis



9567334

Alonzo:

I scanned the results and noticed that one of the samples showed a benzene level of 2500 ug/l. or 2.5 mg/l. Therefore, it would appear to me that the water within the tank would be considered a D018 (Benzene). This is a characteristic waste and therefore the discharge limitations for land application must be less than the levels established for all the constituents listed at 268.48. Please review my analysis and lets discuss.

Thanks

Gary Moore  
Federal On-Scene Coordinator  
EPA Region 6  
Cell: 214-789-1627  
Work: 214-665-6609  
email: [moore.gary@epa.gov](mailto:moore.gary@epa.gov)

From: "Arredondo, Alonzo" <[AArredondo@trcsolutions.com](mailto:AArredondo@trcsolutions.com)>  
To: Gary Moore/R6/USEPA/US@EPA  
Cc: "Halasz, Stephen (Austin,TX-US)" <[SHalasz@trcsolutions.com](mailto:SHalasz@trcsolutions.com)>  
Date: 03/04/2012 11:42 AM  
Subject: Tank 26 Water Analysis

---

Gary,

As you requested, please find attached the analysis of water from Tank 26.

Alonzo Arredondo  
TRC Environmental Corp.

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---